

STEPTOE & JOHNSON LLP

ATTORNEYS AT LAW

1330 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036-1795

PHOENIX, ARIZONA
TWO RENAISSANCE SQUARE

TELEPHONE: (602) 257-5200
FACSIMILE: (602) 257-5299

(202) 429-3000

FACSIMILE: (202) 429-3902

TELEX: 89-2503

STEPTOE & JOHNSON INTERNATIONAL
AFFILIATE IN MOSCOW, RUSSIA

TELEPHONE: (011-7-501) 258-5250
FACSIMILE: (011-7-501) 258-5251

SARA BETH WATSON
(202) 429-6460

September 20, 1996

VIA TELECOPY AND FIRST CLASS MAIL

Damaris Cristiano, Esq.
Assistant Regional Counsel
Office of Regional Counsel
U.S. EPA - Region II
17th Floor
290 Broadway
New York, New York 10007-1866

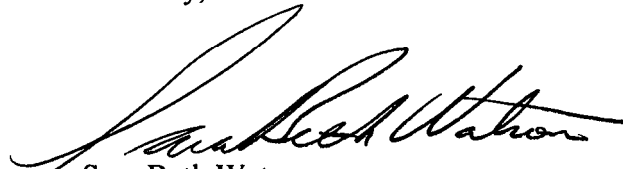
Re: SCP/Carlstadt De Minimis Settlement

Dear Ms. Cristiano:

Enclosed is an affidavit from Carol Quin of Clean Sites, Inc., the allocation consultant for the Cooperating PRP Group.

If you have any questions regarding the attached, please contact me at the above number.

Sincerely,



Sara Beth Watson

cc: Elizabeth Yu, Esq., U.S. Department of Justice
Richard Puvogel, U.S. EPA Region II
William Warren, Esq.

RECEIVED
SEP 23 1996

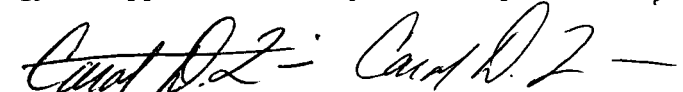
598822



Certification Statement Regarding Evaluation of Waste-In Amount for the SCP/Carlstadt Superfund Site, 216 Paterson Plank Road Carlstadt, New Jersey.

The undersigned is a project manager at Clean Sites, Inc. in Alexandria, Virginia. Clean Sites is an independent public interest organization that assists government entities and private companies in environmental matters. Clean Sites, at the request of the Common Counsel for the Cooperating PRP Group at the SCP/Carlstadt Superfund Site, 216 Paterson Plank Road Carlstadt, New Jersey ("the Site"), conducted a review of various documents to determine a waste-in list for the Site, including information from Cooperating PRP group members on material allegedly sent to the site and transactions with SCP via the SCP-Carlstadt Questionnaire responses and other documents submitted by the PRPs; New Jersey Special Waste Manifests; and other miscellaneous materials.

For each company Clean Sites reviewed and entered into a waste-in database the information submitted by the company in their Questionnaire Response. Clean Sites then conducted a review of each company's submission and compared it to information received from other companies, the New Jersey Special Waste Manifests and other materials. The same procedures were applied to all companies for whom Clean Sites made a waste-in determination. Clean Sites conducted a review for quality assurance purposes to ensure that our methodology was applied consistently to all companies.


Carol Quinn



Title

ACKNOWLEDGEMENT

State of Virginia)
) ss:
City of Alexandria)

On this day 19th of September, 1996, before me, Notary Public in and for Alexandria, Virginia, personally appeared Carol Quinn, known to me to be the person whose name is subscribed to the attached instrument.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.


Notary Public

My Commission expires: